

Table 5G-1. Cross Reference of 49 CFR Part 194 Requirements to LPP Facility Response Plan

Regulatory Requirement	LPP ER Document Cross Reference	Comments on Compliance Status
194.103 Significant and substantial harm; operators statement. (a) Each operator shall submit a statement with its response plan, as required by 194.107 and 194.113, identifying which line sections in a response zone can be expected to cause significant and substantial harm to the environment in the event of a discharge of oil into or on the navigable waters or adjoining shorelines.	Vol. II, Sec. 1.2.3 Vol. II, Sec. 1.3 Vol. II, Sec. 4	In compliance
194.105 Worst case discharge. (a) Each operator shall determine the worst case discharge for each of its response zones and provide the methodology, including calculations, used to arrive at the volume.	Vol. II, Sec. 2.2 Vol. II, Sec. 4	In compliance
194.107 General response plan requirements. (a) Each response plan must plan for resources for responding, to the maximum extent possible, to a worst case discharge, and to a substantial threat of such a discharge.	Vol. I, Sec. 4 Vol. II, Sec. 4	In compliance. Potential improvement would be to more specifically discuss fire fighting outside metropolitan areas.
194.107(b) Each response plan must be written in English and also, if applicable, in a language that is understood by the personnel responsible for carrying out the plan.	All	Document reviewed is written in English. Availability of Spanish version is unknown. It is not expected that "personnel responsible for carrying out the plan" would be unable to read English.
194.107(c) Each response plan must be consistent with the National Contingency Plan (NCP) (40 CFR part 300) and each applicable Area Contingency Plan (ACP). An operator must certify that it has reviewed the NCP and each applicable ACP and that its response plan is consistent with the existing NCP and each existing applicable ACP.	Vol. I, Sec. 1.3 Vol. I, Sec. 1.5	In compliance
194.107(d) Each response plan must include:	Vol. I	In compliance
(1) A core plan consisting of--	Vol. I, Sec. 1.2.1	
(i) An information summary as required in 194.113,		
(ii) Immediate notification procedures,	Vol. I, Sec. 3.2	In compliance
(iii) Spill detection and mitigation procedures,	Vol. I, Sec. 3	In compliance
(iv) The name, address, and telephone number of the oil spill response organization, if appropriate,	Vol. I, Table 3.2-2	In compliance
(v) Response activities and response resources,	Vol. I, Sec. 3 & 4	In compliance
(vi) Names and telephone numbers of Federal, state and local agencies which the operator expects to have pollution control responsibilities or support,	Vol. I, Sec. 3.2.5 Vol. II, Sec. 3.3 Vol. II, Sec. 4	In compliance. Also referred to the Williams Emergency Response Plan for contacts.
(vii) Training procedures,	Vol. I, Sec. 6	In compliance
(viii) Equipment testing,	Vol. I, Sec. 4.4	In compliance

Table 5G-1. (Continued)

Regulatory Requirement	LPP ER Document Cross Reference	Comments on Compliance Status
(ix) Drill types, schedules, and procedures, and	Vol. I, Sec. 6.4	In compliance
(x) Plan review and update procedures; and	Vol. I, Sec. 1.4	In compliance
(2) An appendix for each response zone. Each response zone appendix must include the information required in paragraph (d)(1) (i)-(ix) of this section that is specific to the response zone and the worst case discharge calculations.	Vol. II, Sec. 4	In compliance
(i) An information summary as required in 194.113,	Vol. II, Sec. 4	In compliance
(ii) Immediate notification procedures,	Vol. II, Sec. 3 Environmentally Sensitive Area (ESA) sheets Work Site Response Plans (WSRP)	In compliance
(iii) Spill detection and mitigation procedures,	Vol. II, WSRPs	General detection and mitigation in Vol. I. Only response zone specific mitigation is in the WSRPs.
(iv) The name, address, and telephone number of the oil spill response organization, if appropriate,	Vol. II, Sec. 3 & ESAs	In compliance
(v) Response activities and response resources,	Vol. II, ESAs & WSRPs	In compliance. More general activities and procedures are in Vol. I.
(vi) Names and telephone numbers of Federal, state and local agencies which the operator expects to have pollution control responsibilities or support,	Vol. II, Sec. 3 & ESAs	In compliance
(vii) Training procedures,	Vol. I, Sec. 6	Only general training in Vol. I. There is no response zone specific training discussion.
(viii) Equipment testing,	Vol. I, Sec. 4.4	Only general testing in Vol. I. There is no response zone specific testing discussion.
(ix) Drill types, schedules, and procedures.	Vol. I, Sec. 6.4	Only general exercises in Vol. I. There is no response zone specific exercise discussion.
194.109 Submission of state response plans. (a) In lieu of submitting a response plan required by 194.103, an operator may submit a response plan that complies with a state law or regulation, if the state law or regulation requires a plan that provides equivalent or greater spill protection than a plan required under this part.	Not Applicable	In compliance. LPP has prepared a Facility Response Plan.

Table 5G-1. (Continued)

Regulatory Requirement	LPP ER Document Cross Reference	Comments on Compliance Status
194.111 Response plan retention. Each operator shall maintain relevant portions of its response plan at the following locations: (1) The response plan at the operator's headquarters;	Vol. I, Sec. 1.4.4	The applicable section refers to a Plan Distribution List which is not included in the copy reviewed.
(2) The core plan and relevant response zone appendices for each line section whose pressure may be affected by the operation of a particular pump station, at that pump station; and	Vol. I, Sec. 1.4.4	The applicable section refers to a Plan Distribution List which is not included in the copy reviewed.
(3) The core plan and relevant response zone appendices at any other locations where response activities may be conducted.	Vol. I, Sec. 1.4.4	The applicable section refers to a Plan Distribution List which is not included in the copy reviewed.
194.111 (b) Each operator shall provide a copy of its response plan to each qualified individual.	Vol. I, Sec. 1.4.4	The applicable section refers to a Plan Distribution List which is not included in the copy reviewed.
194.113 Information summary. The information summary for the core plan, required by 194.107, must include: (1) The name and address of the operator; and	Vol. I, Sec. 1.2.1	In compliance
(2) For each response zone which contains one or more line sections that meet the criteria for determining significant and substantial harm as described in 194.103, a listing and description of the response zones, including county(s) and state(s).	Vol. I, Sec. 1.2.3 Vol. II, Sec. 4	In compliance
194.113 (b) The information summary for the response zone appendix, required in 194.107, must include: (1) The information summary for the core plan;	Vol. II, Sec. 1.2 Vol. II, Sec. 4	In compliance
(2) The name and telephone number of the qualified individual available on a 24-hour basis;	Vol. II, Sec. 3 Vol. II, Table 3.2.1	In compliance
(3) The description of the response zone, including county(s) and state(s), for those zones in which a worst-case discharge could cause substantial harm to the environment;	Vol. II, Sec. 1.3 Vol. II, Sec. 4	In compliance
(4) A list of line sections for each pipeline contained in the response zone, identified by milepost or survey station number, or other operator designation;	Vol. II, Sec. 4 ESAs	In compliance
(5) The basis for the operator's determination of significant and substantial harm; and	Vol. II, Sec. 1.2.3 Vol. II, Sec. 2	In compliance
(6) The type of oil and volume of the worst-case discharge.	Vol. I, Sec. 3.3.2 Vol. I, Table 3.3-1 Vol. II, Sec. 2 Vol. II, Sec. 4.2.2	In compliance

Table 5G-1. (Continued)

Regulatory Requirement	LPP ER Document Cross Reference	Comments on Compliance Status												
194.115 Response resources. (a) Each operator shall identify and ensure, by contract or other approved means, the resources necessary to remove, to the maximum extent practicable, a worst-case discharge and to mitigate or prevent a substantial threat of a worst-case discharge.	Vol. I, Certification in Foreword Vol. I, Sec. 4 Vol. I, Sec. 8 Vol. II, Sec. 5	In compliance												
194.115 (b) An operator shall identify in the response plan the response resources which are available to respond within the time specified, after discovery of a worst-case discharge, or to mitigate the substantial threat of such a discharge, as follows: <table><tr><td></td><td><u>Tier 1</u></td><td><u>Tier 2</u></td><td><u>Tier 3</u></td></tr><tr><td>High volume area...</td><td>6 hrs....</td><td>30 hrs.....</td><td>54 hrs.</td></tr><tr><td>All other areas.....</td><td>12 hrs....</td><td>36 hrs.....</td><td>60 hrs.</td></tr></table>		<u>Tier 1</u>	<u>Tier 2</u>	<u>Tier 3</u>	High volume area...	6 hrs....	30 hrs.....	54 hrs.	All other areas.....	12 hrs....	36 hrs.....	60 hrs.	Vol. I, Sec. 4.2 Vol. I, Sec. 8 Vol. II, Sec. 4; Vol. II, ESAs & WSRPs	In compliance
	<u>Tier 1</u>	<u>Tier 2</u>	<u>Tier 3</u>											
High volume area...	6 hrs....	30 hrs.....	54 hrs.											
All other areas.....	12 hrs....	36 hrs.....	60 hrs.											
194.117 Training. Each operator shall conduct training to ensure that: All personnel know— (i) Their responsibilities under the response plan,	Vol. I, Sec. 6.1	In compliance												
(ii) The name and address of, and the procedure for contacting, the operator on a 24-hour basis, and	Vol. I, Sec. 6.3	In compliance												
(iii) The name of, and procedures for contacting, the qualified individual on a 24-hour basis;	Vol. I, Sec. 6.3	In compliance												
Reporting personnel know— (i) The content of the information summary of the response plan,	Vol. I, Sec. 6.3	In compliance												
(ii) The toll-free telephone number of the National Response Center, and	Vol. I, Sec. 6.3	In compliance												
(iii) The notification process; and	Vol. I, Sec. 6.3	In compliance												
Personnel engaged in response activities know— (i) The characteristics and hazards of the oil discharged,	Vol. I, Sec. 6.3	In compliance												
(ii) The conditions that are likely to worsen emergencies, including the consequences of facility malfunctions or failures, and the appropriate corrective actions,	Vol. I, Sec. 6.3	In compliance												
(iii) The steps necessary to control any accidental discharge of oil and to minimize the potential for fire, explosion, toxicity, or environmental damage, and	Vol. I, Sec. 6.3	In compliance												
(iv) The proper firefighting procedures and use of equipment, fire suits, and breathing apparatus.	Vol. I, Sec. 6.3	In compliance												
194.117 (b) Each operator shall maintain a training record for each individual that has been trained as required by this section. These records must be maintained in the following manner as long as the individual is assigned duties under the response plan: (1) Records for operator personnel must be maintained at the operator’s headquarters; and	Vol. I, Sec. 6.2	In compliance												

Table 5G-1. (Continued)

Regulatory Requirement	LPP ER Document Cross Reference	Comments on Compliance Status
(2) Records for personnel engaged in response, other than operator personnel, shall be maintained as determined by the operator.	Vol. I, Sec. 6.2.1	In compliance
194.119 Submission and approval procedures. (a) Each operator shall submit two copies of the response plan required by this part. Copies of the response plan shall be submitted to: Pipeline Response Plans Officer, Research and Special Programs Administration, Department of Transportation, 400 Seventh Street, SW, Washington, DC 20590-0001.	Unknown	Unknown
194.121 Response plan review and update procedures. (a) Each operator shall review its response plan at least every 5 years from the date of submission and modify the plan to address new or different operating conditions or information included in the plan.	Vol. I, Sec. 1.4	In compliance
194.121 (b) If a new or different operating condition or information would substantially affect the implementation of a response plan, the operator must immediately modify its response plan to address such a change and, within 30 days of making such a change, submit the change to RSPA. Examples of changes in operating conditions that would cause a significant change to an operator's response plan are: (1) An extension of the existing pipeline or constructions of a new pipeline in a response zone not covered by the previously approved plan;	Vol. I, Sec. 1.4	In compliance
(2) Relocation or replacement of the pipeline in a way that substantially affects the information included in the response plan, such as a change to the worst-case discharge volume;	Vol. I, Sec. 1.4	In compliance
(3) The type of oil transported, if the type affects the required response resources, such as a change from crude oil to gasoline;	Vol. I, Sec. 1.4	In compliance
(4) The name of the oil spill removal organization;	Vol. I, Sec. 1.4	In compliance
(5) Emergency response procedures;	Vol. I, Sec. 1.4	In compliance
(6) The qualified individual;	Vol. I, Sec. 1.4	In compliance
(7) A change in the NCP or an ACP that has significant impact on the equipment appropriate for response activities; and	Vol. I, Sec. 1.4	In compliance
(8) Any other information relating to circumstances that may affect full implementation of the plan.	Vol. I, Sec. 1.4	In compliance